

## **Novir Privacy Policy**

This Data Privacy Policy describes certain information that Novir, LLC (“we,” “our,” or “us”) collects from visitors to our website <https://novir-usa.com/> (the “Website”) and how we use that information. By using the Website, you agree to the collection and use of information by us in accordance with this Privacy Policy. While this Privacy Policy describes how we treat personal information collected from the Website, please be aware that additional terms and conditions may apply for certain parts of our Website, web-apps, platforms or our services. To the extent that this Privacy Policy conflicts with any terms specific to our services, the specific service terms shall apply.

We may revise this Privacy Policy at any time. We will notify you of any material changes by posting the new Privacy Policy here and by changing the “Effective Date” at the end of the Privacy Policy.

### **What information is collected on the Website?**

*Information you provide to us.* We may collect personal information about you when you provide it to us while using or interacting with the Website such as your name, email address, telephone number, mailing address, login information, location, account information, messages you submit via the Website’s form, and other information that may personally identify you.

*Information we collect automatically.* As you use our Website, we may use technologies that collect certain information about you automatically. We may collect, among other things, your IP address, location, device type, date and time of visit, browser type and version, your activities on the Website, and information about how you use the Website. If you are visiting the Website via a mobile device, we may also collect your mobile device’s unique device ID and information about how you use the Website.

*Information we receive from third parties.* From time to time, we receive information about individuals from our third party service providers, affiliates, and partners. For example, we receive information on our email from our third party service providers, including whether you have read an email sent by us or on our behalf, forwarded an email, and when and how many times you have opened an email. We may also receive information from third party analytics on the Website that allow us to improve our Website.

### *Types of personal data we might collect, can include but are not limited to:*

Contact information (name, address, email, phone number)  
Medical information (if you are a patient)  
Employment-related information (employer or potential employer name)  
Insurance and billing information  
Website usage data (cookies, IP address, browser information)

### **What do we do with information collected on the Websites?**

We use this information to administer the Website, to communicate with you, improve our Website and marketing efforts, and as generally permitted under applicable law. We also use information we gather to track activity within our Websites and to gather demographic

information. We sometimes use the information that we collect to improve the design and content of our Websites and to enable us to personalize your Internet experience. We also may use this information to analyze how our Website is used, as well as to offer you products, programs, or services that may be of particular interest to you. We may also use information we collect automatically that is otherwise de-identified, aggregated, or anonymous for any purpose.

### **Does the Website Use Cookies?**

To understand how our online advertising performs, we (or our service providers) may collect certain information regarding your usage of the Website, using cookies, IP addresses, and other technologies such as anonymous identifiers.

“Cookies” are pieces of information generated by web servers and stored in your computer for future access. For example, our Website includes Cookies used by the Google Analytics Demographics and Interest Reporting cookie, which facilitate our use of Google Analytics Advertising Features, described below.

You may disable the use of cookies by our Website, but this will limit the functionality available to you on future visits. For more information on how Google Analytics collects and processes data, please see <http://www.google.com/intl/en/policies/technologies/ads/>.

### **You can Opt Out of Google Analytics by:**

- Changing your settings at Google’s Ad Settings at: <http://www.google.com/settings/ads>
- Installing an Opt-Out browser add-on available at: <https://tools.google.com/dlpage/gaoptout/>
- Adjusting the settings on your web browser: See <http://www.google.com/intl/en/policies/technologies/managing>

### **Do we share information we collect with third parties?**

We may share your information with third parties that assist us in providing our services for advertising, and marketing purposes, and potentially other reasons. In addition, we may release information to comply with requests from law enforcement and government agencies, to enforce the terms of our services, and to protect our customers and others. We may also share your information with third parties if we believe disclosure is necessary to enforce or protect our rights, property, or safety, or that of our users or third parties. We may share aggregate, de-identified information with others, including affiliated companies and non-affiliated companies for any legal purpose.

### **Your choices**

Cookies. If you do not wish us to place cookies, you may set your browser to refuse some cookies, or to alert you when cookies are being sent. If you do so, please note that some parts of the Website may then be inaccessible or may not function properly. Information on deleting or controlling cookies can be found at [www.aboutcookies.org](http://www.aboutcookies.org).

Opt-Out. You may opt out of receiving future marketing communications from us any time we request your personal information. You can opt out by using the unsubscribe process by contacting us using the below listed methods. We will use commercially reasonable efforts to process such request in a timely manner.

## **Links to other websites**

The Website may provide links to other websites. When you choose to use a link to visit another website, you are then subject to the security and privacy policy of that website. We are not responsible for the privacy, security, accuracy, or reliability of the information on third party websites. You access such links at your own risk. We recommend you read the privacy policy of a website before disclosing any of your information. Links to third party websites do not imply an affiliation between us and the website owner, or any endorsement, approval, or verification of any content contained on those websites.

## **Contact us**

If you have any questions or concerns regarding our Privacy Policy, please contact us at [info@novir-usa.com](mailto:info@novir-usa.com).

## **Data Privacy Policy**

### **Data Security**

We implement technical and organizational measures to protect your data from unauthorized access, alteration, disclosure, or destruction. Access to personal data is restricted to authorized personnel only. While we strive to employ reasonable security measures, please understand that no data transmission or storage method can be entirely secure.

### **Security Safeguards**

- a. Technical Safeguards: The Company employs industry-standard technical measures to ensure the security of PHI, including encryption, access controls, authentication, and audit logging.
- b. Physical Safeguards: The physical infrastructure and data storage facilities used by the Company are designed to prevent unauthorized physical access to PHI.
- c. Administrative Safeguards: Access to PHI is restricted to authorized personnel who have undergone training on HIPAA compliance. The Company maintains policies and procedures for workforce training, data breach response, and risk assessment.

### **Data Collection and Usage**

- a. Collection of PHI: The Company collects and processes PHI solely for the purpose of providing its data platform and services. PHI includes but is not limited to patient records, medical histories, diagnostic information, and other sensitive health-related data.
- b. Usage of PHI: The Company will use PHI only as necessary to perform the contracted services and provide access to the data platform. PHI will not be disclosed, sold, or shared with unauthorized third parties without the explicit consent of the data owner or as required by law.

### **Data Sharing and Disclosure**

We may share your information with third parties in the following circumstances:  
With service providers who assist us in carrying out business operations  
To comply with legal obligations or respond to lawful requests

In the event of a merger, acquisition, or sale of all or a portion of our assets

*We use the collected information for the following purposes:*

To report test results or immunization records to state agencies when required by law

To report, process and manage employment-related matters with your employer

To process transactions and fulfill orders

To comply with legal obligations and protect our rights and interests

### **Business Associates and Subcontractors**

a. Business Associate Agreements: The Company enters into HIPAA-compliant business associate agreements (BAAs) with third-party vendors and subcontractors who may have access to PHI.

b. Oversight of Subcontractors: The Company performs due diligence on subcontractors and monitors their compliance with applicable HIPAA regulations.

### **Use of Patient Data for Machine Learning AI Models**

Novir may utilize patient data to train machine learning AI models to advance medical research and improve patient outcomes. Data used for AI model training will be anonymized and aggregated whenever possible to protect patient privacy. The data will be solely used for developing and refining AI algorithms related to healthcare and medical diagnostics.

### **Your Rights**

You have the right to access, correct, or delete your personal data that we hold. If you wish to exercise these rights or have any concerns about your data, please contact us using the information provided at the end of this policy. Individuals have the right to access and, if necessary, request amendments to their own PHI. Requests must be submitted in writing and will be processed in accordance with HIPAA regulations.

### **Data Retention**

We will retain your personal data for as long as necessary to fulfill the purposes outlined in this policy or as required by applicable laws and regulations. PHI will be retained for the duration specified in the applicable contract and in compliance with legal requirements. After the retention period, PHI will be securely deleted or de-identified.

### **Reporting Breaches**

In the event of a breach of unsecured PHI, the Company will promptly investigate and provide notifications as required by law

### **Compliance Audits and Reviews**

The Company conducts regular internal audits to ensure compliance with HIPAA regulations and the effectiveness of security controls.

## **Changes to this Policy**

The Company reserves the right to update this Data Policy as necessary to reflect changes in regulations, industry standards, and our services. Updated policies will be communicated to all relevant parties.

## **Contact Information**

For questions, concerns, or to request further information regarding this Data Policy and HIPAA compliance, please contact our Privacy Officer at [info@novir-usa.com](mailto:info@novir-usa.com)